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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

FEB 11 1993

4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Byron Brant  
Department of the Navy - Atlantic Division  
Naval Facilities Engineering Command  
Code 1822  
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site  
Sites 21, 24 and 78  
Jacksonville, North Carolina

Dear Mr. Brant:

EPA has reviewed the document titled "Draft Final Remedial Investigation and Feasibility Study Work Plan for Operable Unit No.1 (Sites 78, 21 and 24) and associated documents. The revised documents substantially incorporate EPA comments. The documents are approved, however, EPA requests the Navy consider and incorporate the enclosed comments.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in black ink that reads "Michelle M. Glenn".

Michelle M. Glenn  
Senior Project Manager

Enclosure

cc: Peter Burger, NCDEHNR  
George Radford, MCB Camp Lejeune

COMMENTS  
DRAFT FINAL WORK PLAN  
Operable Unit One  
(Sites 78, 21 and 24)

GENERAL COMMENTS

1. The response to EPA's General Comment No. 3 on the Draft RI/FS Work Plan states that the first round of groundwater and soil samples for each site will be analyzed for the full Target Compound List/Target Analyte List (TCL/TAL) as EPA requested; however, this is not incorporated in Table 5.1, Section 5 of the Draft Final RI/FS Work Plan. The response also states that all samples from existing wells will be analyzed for volatile organic compounds and inorganic compounds. These parameter groups are not included in Table 5.1.
2. The response to EPA's General Comment No. 7 on the Draft RI/FS Work Plan states that background surface water/sediment data has already been collected during the investigation of Site 6 and will be used for this investigation. This surface water/sediment background analytical data that was derived from the investigation of Site 6 is not included in the Draft Final RI/FS Work Plan.
3. The response to EPA's General Comment No. 9 on the Draft RI/FS Work Plan states that the background sediment and surface water samples that EPA requested have already been collected and analyzed and that the background soil and groundwater samples will be collected in the proposed investigation. The existing background sediment and surface water analytical data is not presented, and the proposed background soil and groundwater samples are not discussed in the Draft Final RI/FS Work Plan.

SPECIFIC COMMENTS

1. Response to EPA Specific Comment No.3 on the Draft RI/FS Work Plan, Page 2-36, Section 2.3.5.2: The response to EPA's Specific Comment No. 3 states that the exact sampling locations are unknown. If the locations are unknown, information obtained from them is of little value.
2. Response to EPA Specific Comment No. 4 on the Draft RI/FS Work Plan, Page 2-40, Section 2.4.5: See Specific Comment No. 1.

3. Response to EPA Specific Comment No. 8 on the Draft RI/FS Work Plan, Page 5-4, Section 5.3.1.3: The response to EPA's Specific Comment No. 8 states that no additional soil sampling is warranted for areas surrounding buildings 1202 and 1709. Soil samples from buildings 1202 and 1709 are necessary to confirm whether or not these buildings are source areas. Building 1202 was a maintenance shop, and building 1709 was an Equipment Building/Storage facility formally used for vehicle maintenance. This information was obtained from Table 3-1, Pages 3-3 and 3-5. No response was given for the last portion of Comment No. 8 stating that all surface soil samples should be analyzed for full scan TCL organic compounds and TAL inorganic compounds.
4. Response to EPA Specific Comment No. 12 on the Draft RI/FS Work Plan, Page 5-20, Section 5.3.1.3: The response to EPA's Specific Comment No. 12 states that monitoring wells HPGW1 and HPGW29 are on the edge of the existing plume and that wells to the southwest would not provide significant information to either assess human health risks or to formulate remedial alternatives. Monitoring well GW20 is located at or near the western boundary of the lead plume, and wells to the west of GW20 would not significantly contribute to assessing the extent of contamination, estimating health and environmental risks or formulating remedial alternatives. The area southeast of HPGW16 will be studied during the soil gas survey. It is not possible to evaluate these responses because the analytical data sheets have not been included in the Draft Final RI/FS Work Plan.
5. Response to EPA Specific Comment No. 15 on the Draft RI/FS Work Plan, Page 5-27, Section 5.3.2.2: The second portion of Comment No. 15 states that all surface soil samples should be analyzed for full scan TCL organic compounds and TAL inorganic compounds. However, this was not incorporated in the Draft Final RI/FS Work Plan.
6. Response to EPA Specific Comment No. 16 on the Draft RI/FS Work Plan, Pages 5-32 and 5-41, Sections 5.3.2.3 and 5.3.3.3: The response to EPA's Specific Comment No. 16 included in Section 5 as justification for the use of polyvinyl chloride (PVC) monitoring well construction materials. Utilizing PVC for construction of monitoring wells is not in compliance with the ECB SOPQAM. PVC is not acceptable

for monitoring organic compounds because of its sorption and leaching properties. The ECB SOPQAM recommends that the well casing and screen be constructed of stainless steel (304 or 316) or Teflon, unless otherwise approved.

Draft Final RI/FS Sampling and Analysis Plan

1. Response to EPA Specific Comment No. 6 on the Draft RI/FS Sampling and Analysis Plan, Page 3-28, Section 3.2.3.1: See Specific Comment No. 6.
2. Response to EPA Specific Comment No. 8 on the Draft RI/FS Sampling and Analysis Plan, Page 5-12, Section 5.5: The response to EPA's Specific Comment No. 8 states that the coring device is described in section 5.5 and that the decontamination procedures are described in section 5.6.1.2. These descriptions were not provided.
3. Response to EPA Specific Comment No. 10 on the Draft RI/FS Sampling and Analysis Plan, Page 3-40, Section 3.4: The response to EPA's Specific Comment No. 10 states that one preservative blank will be collected at the beginning of this field program. Section 4.3.3 of the ECB SOPQAM states that a preservative blank must be collected and analyzed in the field at the beginning and end of the study.
4. Response to EPA Specific Comment No. 18 on the Draft RI/FS Sampling and Analysis Plan, Page 5-12, Section 5.5: The response to EPA's Specific Comment No. 18 presents a justification for not using the glass or Teflon inserts as EPA requested. The Navy asserts that glass or Teflon inserts would most likely be damaged, that field personnel would be unable to determine whether enough sample had been collected for analysis and that Baker Environmental has encountered no analysis problems from the use of plastic inserts. The justification for using plastic inserts in the coring device is not in accordance with the ECB SOPQAM. Teflon or glass inserts or the use of stainless steel coring devices is recommended.

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ENVIRONMENTAL PROTECTION AGENCY  
REGION IV  
345 COURTLAND STREET  
ATLANTA GEORGIA 30365

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